

**OFFICE OF THE STANDING CHAPTER 13 TRUSTEE**  
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**North Richland Hills, TX 76180-6608**  
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**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE NORTHERN DISTRICT OF TEXAS**  
**FORT WORTH DIVISION**

**IN RE:**

**Case No: 24-41512-MXM**

**DAVID LYN LUTTRELL**

**Court Hearing:**

**Time & Date: 8:30 AM on**  
**Thursday, August 15, 2024**

**Debtor,**

**TRUSTEE'S AMENDED OBJECTION TO CONFIRMATION**

**TO THE HONORABLE MARK X MULLIN, U.S. BANKRUPTCY JUDGE:**

Now comes Tim Truman, the Standing Chapter 13 Trustee, and files this his "Trustee's Amended Objection to Confirmation" of the Plan heretofore filed herein by Debtor, and for the same would respectfully show the Court as follows:

In addition to the grounds alleged in the previous objection, which are incorporated herein by reference, the Trustee objects to Confirmation of the Plan for the following reason(s):

The Plan fails to meet the "feasibility" requirements of 11 U.S.C. Section 1325 (a) (6) of the Bankruptcy Code. In this regard, the Trustee would show that the Debtor's proposed Plan provides for the following plan payments:

**DEBTOR PAY SCHEDULE NO. 1 (DAVID LYN LUTTRELL)**

PAYMENT BEGINNING: 05/31/2024 FOR 1 MONTHS IN THE AMOUNT OF: \$1,746.00

PAYMENTS BEGINNING: 06/30/2024 FOR 59 MONTHS IN THE AMOUNT OF: \$1,449.00

The Debtor's monthly surplus per Schedules I and J is \$1,780.82. Therefore, the Plan does not appear to be feasible for that reason, and for the following reason(s) if any:

DAVID LYN LUTTRELL has not provided the Trustee with current pay stubs, a current Profit & Loss Statement, or other income verification to support the income information reflected on Schedule I. Until the financial affairs of the Debtor are more completely documented and examined, the Trustee is unable to recommend Confirmation of the Plan.

**WHEREFORE, PREMISES CONSIDERED**, the Trustee prays that said Plan not be confirmed unless and until it has been modified to cure all objections set forth hereinabove, and for general relief.

24-41512-MXM DAVID LYN LUTTRELL

Trustee's Amended Objection to Confirmation

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Respectfully submitted,

By: /s/ Angela D. Allen

Tim Truman, Bar # 20258000  
Standing Chapter 13 Trustee  
Angela Allen, Bar # 007869700  
Staff Attorney

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing "Trustee's Objection to Confirmation" was served on all parties listed below in the manner listed below on or before June 27, 2024.

/s/ Angela D. Allen

Tim Truman, Angela Allen

**BY FIRST CLASS MAIL:**

DAVID LYN LUTTRELL, 2209 PONTIAC DR, ARLINGTON, TX 76013-0000

**BY ELECTRONIC SERVICE:**

NORRED LAW PLLC, 515 E BORDER, ARLINGTON, TX 76010

POPE HARDWICKE CHRISTIE SCHELL KELLY & TAPLETT, 500 W 7TH ST STE 600, FORT WORTH, TX 76102

LINEBARGER GOGGAN BLAIR & SAMPSON LLP, 2777 N STEMMONS FWY #1000, DALLAS, TX 75207

United States Trustee, 1100 COMMERCE STREET, ROOM 976, DALLAS, TX 75242